

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Application of San Diego Gas & Electric
Company (U 902 M) and Southern California
Gas Company (U 904 G) For Authority to
Establish California Consumer Privacy Act
Memorandum Accounts (AB375-CCPAMA)

**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) AND
SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) FOR AUTHORITY TO
ESTABLISH CALIFORNIA CONSUMER PRIVACY ACT
MEMORANDUM ACCOUNTS (AB375-CCPAMA)**

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March 28, 2019

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OFFICER VERIFICATION of Southern California Gas Company

OFFICER VERIFICATION of San Diego Gas & Electric Company

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I. INTRODUCTION

Pursuant to California Public Utilities Code (“Cal. PUC”) Sections 451 and 454, and California Public Utilities Commission (“Commission”) Rules (“Rules”) 2.1-2.3, San Diego Gas & Electric Company (“SDG&E”) and Southern California Gas Company (“SoCalGas,” collectively “Applicants”) hereby submit this joint application (“Application”) for authorization to establish the Gas and Electric Assembly Bill 375 Memorandum Accounts (“AB375-CCPAMA”). By this Application, SoCalGas and SDG&E are requesting authorization to establish the AB375-CCPAMA to record incremental costs associated with compliance with the consumer privacy rights promulgated by Assembly Bill (“AB”) 375¹ and Senate Bill (“SB”) 1121,² collectively known as the California Consumer Privacy Act (“CCPA”) of 2018, the privacy regulations required to be adopted by the California Attorney General in accordance with that law, and any further modifications passed by the legislature. Draft tariff language to support each Applicant’s respective AB375-CCPAMA is attached to this Application in the draft preliminary statements included in Attachment A.

¹ AB375, Stats. 2017-2018, Ch. 55 (Cal. 2018).

² SB 1121, Stats. 2017-2018, Ch. 735 (Cal. 2018).

II. BACKGROUND

The legislation that evolved into the CCPA began with AB375, first read on February 9, 2017.³ The bill was moved to the inactive legislative file on September 16, 2017.⁴ AB375 remained inactive until June 21, 2018, and within the course of only one week was approved, signed into law by California Governor Jerry Brown and filed with the Secretary of State on June 28, 2018.⁵ This occurred less than two weeks before hearings in the SoCalGas and SDG&E general rate case (“GRC”) began on July 9, 2018. SB 1121, which provided technical and clarifying changes to the CCPA, was passed on September 23, 2018, a month and a half after hearings in the GRC concluded on August 8, 2018. This legislation, and compliance costs associated with the new legislation and currently evolving regulations were not, and could not have been, reasonably foreseen at the time the Applicants filed their 2019 GRC applications.

The CCPA is a privacy statute impacting companies doing business with California consumers,⁶ and generally requires those companies to, on consumer request, disclose what data companies are collecting and creating with respect to them, furnish that data to the consumer, permit consumers to opt out from the sale of that data, inform the consumer as to whom their data was disclosed, and delete (subject to exceptions) that data. The personal information to which the CCPA applies is broadly defined and appears to generally include utility energy usage information, financial account numbers and social security numbers, which are necessary components of utility customer operations databases. The law also establishes a private cause of

³ The legislative history time table for AB375 is available at https://leginfo.legislature.ca.gov/faces/billHistoryClient.xhtml?bill_id=201720180AB375.

⁴ *Id.*

⁵ *Id.*

⁶ The CCPA applies to companies that receive personal data from California residents and have “annual gross revenues in excess of [\$25] million dollars....” Civ. Code § 1798.140(c)(1)(A). The law therefore generally applies to SoCalGas and SDG&E.

action against companies with respect to data breaches.⁷ More specifically, beginning January 1, 2020, the CCPA grants consumers the right to request a business to 1) disclose the categories of personal information being collected related to the consumer, 2) disclose whether their personal information is shared, sold or disclosed, and to whom, 3) delete their personal information, with exceptions, 4) opt out of the sale of their personal information, 5) access their personal information, and 6) give equal service and price even if they exercise their privacy rights.⁸ The rights granted by the CCPA will be regulated by the California Attorney General's office, which has begun drafting regulations to implement and enforce the new law.

In order to comply with the implementation of the CCPA, SoCalGas and SDG&E will necessarily need to incur costs to assess their current systems to determine which areas, if any, require action to comply with the new law and related regulations and to make any institutional process and technology changes required to achieve compliance by the January 1, 2020 effective date. Preliminary, non-exhaustive activities that SoCalGas and SDG&E will need to undertake to develop and maintain business processes and technologies necessary to comply with this groundbreaking privacy law include, but are not limited to:

- Conduct data discovery of all personal information that the businesses collect, create, and disclose.

⁷ Cal. Civ. Code § 1798.150(a)(1).

⁸ Cal. Civ. Code §§ 1798.105, 1798.110, 1798.115, 1798.120, 1798.125(a). The entirety of the new requirements of the CCPA are lengthy and span from Cal. Civ. Code § 1798.100 through § 1798.198. The six requirements summarized in text above provide the general requirements that will likely have the most impact on SoCalGas and SDG&E's operations. Other requirements are provided in the statutes, and in the regulations that will be issued by the California Attorney General's Office.

- Develop procedures for handling consumer requests and inquiries, including access to consumer’s personal information, and the deletion of eligible consumer personal information on request.
- Provide a clear and conspicuous “Do Not Sell My Personal Information” link and other information on the businesses’ Internet homepages.
- Update agreements with third-parties and service providers with whom we share personal information.
- Update company website privacy policies with CCPA required information, including a description of California residents’ rights.
- Implement additional reasonable security measures to protect consumers’ personal information in alignment with the new compliance requirements.
- Add and train current employees that handle personal information on the new CCPA requirements to ensure consistent usage and protections for this data.

As the law and regulations continue to evolve it is likely that other changes may be needed for SoCalGas and SDG&E to ensure compliance with the CCPA.⁹ SoCalGas and

⁹ Since its passage, the CCPA has continued to evolve and the implementing regulations remain uncertain. The Attorney General’s Office has been conducting forums and taking feedback from businesses on a variety of issues with respect to the regulatory scheme the Attorney General’s Office will be providing. See State of California Department of Justice, *California Consumer Privacy Act* (CCPA), available at <https://oag.ca.gov/privacy/ccpa> (listing public participation forums, requesting comments) (“The California Attorney General’s Office will be promulgating regulations and soliciting broad public participation to further the purposes of the CCPA. The regulations aim to establish procedures to facilitate consumers’ rights under the CCPA and provide guidance to businesses for how to comply.”). Thus, there may be future changes to the interpretation of the CCPA that could expand or limit SoCalGas’ and SDG&E’s obligations, and, because the Attorney General’s regulations for the CCPA do not have to be in place until July 1, 2020, six months after the law takes effect, the requirements will continue to be a moving target until at least mid-2020. Cal. Civ. Code § 1798.185(a). There are also new bills under consideration by the legislature (as of March 2019) that could further alter obligations under the CCPA. See, e.g., AB 25, AB 288, AB 846, AB 874, AB 981, AB 1146, AB 1355, AB 1416, AB 1564, AB 1760, SB 561, SB 752, SB 753.

SDG&E will seek recovery of their respective costs in rates once those costs are known and in connection with their next general rate case, or other appropriate proceeding.

III. MEMORANDUM ACCOUNT TREATMENT IS APPROPRIATE

A memorandum account is appropriate to allow recovery of incremental costs incurred upon a reasonableness showing at a later time.¹⁰ A memorandum account should be approved unless “the costs are recoverable in a general rate case, the costs are not substantial, or the existence of the costs is speculative.”¹¹ Here, the costs would not be recoverable in the Applicants’ most recent rate case because they were not known in time to allow them to be included in the 2019 GRC proceeding. The costs will be substantial. The actual requirements of the CCPA remain somewhat in flux, and therefore all of the processes necessary to comply with the law are uncertain, however the costs will not be inconsequential. Finally, the existence of the costs is not speculative. The CCPA establishes new requirements that will require technologies and processes for compliance. These new requirements, such as responding to various consumer requests about consumer data residing in the Applicants’ systems, commence January 1, 2020. Although the California Attorney General’s Office has not yet issued all of the regulations related to the CCPA and certain implementation details remain unclear,¹² Applicants must begin, and have begun, incurring costs immediately to ensure their compliance by January 1, 2020.

In addition, Applicants seek recovery as of January 1, 2019, or no later than the time of the filing of this Application. Under Cal. PUC Section 1731(a) the Commission “may set the

¹⁰ See Decision (“D.”) 06-01-018, at 5-6.

¹¹ D.18-06-029 at 7; *see also* D.18-11-051 at 10, Conclusions of Law (“COL”) 2 and 4 (finding Southern California Edison request to establish a Wildfire Expense Memorandum Account reasonable as of date the application was filed with the recovery of costs recorded in that account to be addressed in separate rate recovery proceedings); D.10-12-026 at 6 (authorizing memorandum accounts to record expenses for AB 32 administration fees despite uncertainty as to whether and when AB 32 fees would be assessed).

¹² *Supra* note 7.

effective date of an order or decision before the date of issuance.” In light of the timing of the legislation, the need to begin assessing incremental activities and implementing changes immediately, a request to seek recovery from a date earlier than the date of any Commission decision on the Application is appropriate.¹³

Accordingly, Applicants request that the AB375-CCPAMA be made effective as of January 1, 2019, or no later than the date of this filing, so Applicants may track in the account costs they incurred for compliance prior to the Commission’s disposition of this Application. Applicants further request that the Application be granted on an expedited basis by no later than Summer 2019, without the need for prepared testimony or evidentiary hearings. SoCalGas and SDG&E are submitting their proposed electric and gas preliminary statements in this filing to support establishment of the respective Applicant’s AB375-CCPAMA.¹⁴ The proposed tariffs and this Application will not increase any current rate or charge, or cause withdrawal of service, or conflict with any rate schedule or rule. Nor will this Application prejudice or impair the ability of the Commission or any interested parties to review the costs recorded in the AB375-CCPAMA for reasonableness when SoCalGas and SDG&E seek recovery of costs in a separate application at a later date.

IV. STATUTORY AND PROCEDURAL REQUIREMENTS

A. Rule 2.1 (a) – (c)

In accordance with Rule 2.1 (a) – (c) of the Commission’s Rules of Practice and Procedure, SoCalGas and SDG&E provide the following information.

¹³ See, e.g., D.18-06-029 (allowing recovery from the date of filing); D.18-11-051 (same); *Southern Cal. Edison Co. v. Pub. Util. Comm’n*, 85 Cal. App. 4th 1086, 1090 (2000) (allowing recovery prior to decision date); Resolution E-3761 (November 29, 2001) (allowing recovery prior to effective date).

¹⁴ Attachment A.

1. Rule 2.1 (a) - Legal Name

SDG&E is a corporation organized and existing under the laws of the State of California. SDG&E is engaged in the business of providing electric service in a portion of Orange County and electric and gas service in San Diego County. SDG&E's principal place of business is 8330 Century Park Court, San Diego, California 92123.

SoCalGas is a corporation organized and existing under the laws of the State of California. SoCalGas' principal place of business is 555 West Fifth Street, Los Angeles, California 90013.

2. Rule 2.1 (b) - Correspondence

Correspondence or communications regarding this Application should be addressed to:

Michelle Sommerville
Regulatory Case Manager
San Diego Gas & Electric Company
8330 Century Park Court, CP 32
San Diego, California 92123
Telephone: (858) 654-6356
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with copies to:

Elliott S. Henry
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Southern California Gas Company
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Telephone: (619) 696-4355
Facsimile: (619) 699-5027
Email: scohen@sempra.com

3. Rule 2.1 (c) – Category, Hearings, Issues, Schedule

a. Proposed Category of Proceeding

In accordance with Rule 7.1, SoCalGas and SDG&E request that this Application be categorized as ratesetting because it requests establishment of a memorandum account that will ultimately be addressed in the utilities' next applicable General Rate Case proceeding or other applicable proceeding.

b. Need for Hearings

SoCalGas and SDG&E do not believe that a hearing is necessary for this Application.

c. Issues to be Considered

The issues to be considered are described in this Application. Regarding safety considerations, SoCalGas' and SDG&E's proposal will not result in any adverse safety impacts on the facilities or operations of either SoCalGas or SDG&E.

d. Proposed Schedule

SoCalGas and SDG&E propose the below expedited schedule, including shortened time for protest periods and the potential for shortened or waived comment periods for Proposed Decisions as appropriate. In addition, for efficiency, SoCalGas and SDG&E propose that the Commission consolidate their application with those of the other energy utilities who will also be filing applications to track costs associated with CCPA.

ACTION	DATE
Application	March 28, 2019
Response/Protests	April 29, 2019
SDG&E/SoCalGas Reply Responses/Protests	May 10, 2019 (if necessary)
Prehearing Conference	May 2019 (if necessary)
Proposed Decision on Application (waive or shorten time for comments if appropriate)	May 2019
Final Decision on Application (if comment period waived or shortened)	June 2019
Final Decision on Application (if regular comment period)	July 2019

B. Rule 2.2 – Articles of Incorporation

A copy of SoCalGas’ Restated Articles of Incorporation as last amended, presently in effect and certified by the California Secretary of State, was filed with the Commission on October 1, 1998, in connection with SoCalGas’ Application No. 98-10-012, and is incorporated herein by reference.

A copy of SDG&E’s Restated Articles of Incorporation as last amended, presently in effect and certified by the California Secretary of State, was filed with the Commission on September 10, 2014, in connection with SDG&E's Application No. 14-09-008, and is incorporated herein by reference.

C. Rule 3.2 – Authority to Increase Rates

SoCalGas and SDG&E seek authority for the establishment of memorandum accounts with no immediate rate changes that will result from this Application. Because this application

seeks interim tracking authority and not a rate increase, the requirements of Rule 3.2 are premature and not applicable at this time. Rule 3.2 requirements will be met at the time SoCalGas and SDG&E seek recovery of amounts tracked within the requested AB375-CCPAMA.

D. Rule 1.9 – Service

This is a new application. No service list has been established. Accordingly, SoCalGas and SDG&E are serving this Application on all parties to their 2019 GRC proceedings, A.17-10-007 and A.17-10-008 (cons.).

V. CONCLUSION AND SPECIFIC REQUEST FOR RELIEF

For all the foregoing reasons, SoCalGas and SDG&E respectfully request that the Commission approve this Application in all respects. Specifically, in accordance with the foregoing proposed expedited schedule, SoCalGas and SDG&E request the following specific relief:

1. Approval of authority for SoCalGas and SDG&E to respectively establish an interest-bearing memorandum account for incremental costs incurred associated with complying with California consumer privacy rights as required by AB375 and the rules promulgated thereunder, with an effective date of January 1, 2019, or no later than the filing of this Application; and
2. Granting of such other relief as is necessary and proper.

Respectfully submitted,

By: /s/ Paul Goldstein
Paul Goldstein

Vice President – Customer Services for:

SOUTHERN CALIFORNIA GAS COMPANY

Respectfully submitted,

By: /s/ Scott Crider
Scott Crider

Vice President – Customer Services for:

SAN DIEGO GAS & ELECTRIC COMPANY

/s/ Elliott S. Henry

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/s/ Sharon L. Cohen

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Email: scohen@sempra.com

March 28, 2019

OFFICER VERIFICATION

I am an officer of Southern California Gas Company and am authorized to make this verification on its behalf. The matters stated in the foregoing Application are true to my own knowledge, except as to matters that are stated therein on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 28th day of March 2019, at Los Angeles, California.

By: /s/ Paul Goldstein
Paul Goldstein

Vice President – Customer Services for:

SOUTHERN CALIFORNIA GAS COMPANY

OFFICER VERIFICATION

I am an officer of San Diego Gas & Electric Company and am authorized to make this verification on their behalf. The matters stated in the foregoing Application are true to my own knowledge, except as to matters that are stated therein on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 28th day of March 2019, at San Diego, California.

By: /s/ Scott Crider
Scott Crider

Vice President – Customer Services for:

SAN DIEGO GAS & ELECTRIC COMPANY

ATTACHMENT A



San Diego Gas & Electric Company
San Diego, California

Original

Cal. P.U.C. Sheet No.

XXXXX-G

Canceling

Cal. P.U.C. Sheet No.

PRELIMINARY STATEMENT

Sheet 1 N

V. MEMORANDUM ACCOUNTS

N

CALIFORNIA CONSUMER PRIVACY ACT MEMORANDUM ACCOUNT – GAS (CCPAMA-G)

N

1. **Purpose**

N

The CCPAMA-G is an interest-bearing memorandum account that is recorded on the Utility's financial statements. The purpose of the CCPAMA-G is to record the incremental costs associated with complying with consumer privacy obligations as required by Assembly Bill (AB) 375, which enacted the California Consumer Privacy Act of 2018, effective June 28, 2018, and modified Senate Bill (SB) 1121, effective September 23, 2018.

2. **Applicability**

This account shall apply to all gas customers except those specifically excluded by the Commission.

3. **Rates**

The CCPAMA-G shall be applied to rates as described in Section 5 below.

4. **Accounting Procedures**

The Utility shall maintain the CCPAMA-G by recording entries at the end of each month as follows, net of FF&U, where applicable:

- a. A debit entry equal to the incremental operation and maintenance (O&M) costs and capital-related costs (i.e., depreciation, taxes and return) in complying with AB 375 and SB 1121,
- b. An entry for amortization of the account balance as authorized by the Commission,
- c. An entry to reflect any transfer to or from other regulatory accounts as authorized by the Commission, and
- d. An entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the entries above at a rate equal to 1/12 of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor publication.

N

5. **Disposition**

The disposition of this account balance will be addressed in SDG&E's next General Rate Case proceeding or other applicable proceeding.

IC0

Advice Ltr. No. XXXX-G

Decision No. AB375

Issued by

Dan Skopec

Vice President
Regulatory Affairs

Submitted

Effective

Resolution No.

TBD

TBD

TBD



San Diego Gas & Electric Company
San Diego, California

Canceling _____

Original _____

Cal. P.U.C. Sheet No. _____

XXXXX-E

Cal. P.U.C. Sheet No. _____

PRELIMINARY STATEMENT

Sheet 1

N

III. MEMORANDUM ACCOUNTS

N

**CALIFORNIA CONSUMER PRIVACY ACT MEMORANDUM ACCOUNT – ELECTRIC
(CCPAMA-E)**

N

1. **Purpose**

N

The CCPAMA-E is an interest-bearing memorandum account that is recorded on the Utility's financial statements. The purpose of the CCPAMA-E is to record the incremental costs associated with complying with consumer privacy obligations as required by Assembly Bill (AB) 375, which enacted the California Consumer Privacy Act of 2018, effective June 28, 2018, and modified Senate Bill (SB) 1121, effective September 23, 2018.

2. **Applicability**

This account shall apply to all electric customers except those specifically excluded by the Commission.

3. **Rates**

The CCPAMA-E shall be applied to rates as described in Section 5 below.

4. **Accounting Procedures**

The Utility shall maintain the CCPAMA-E by recording entries at the end of each month as follows, net of FF&U, where applicable:

- a. A debit entry equal to the incremental operation and maintenance (O&M) costs and capital-related costs (i.e., depreciation, taxes and return) in complying with AB 375 and SB 1121,
- b. An entry for amortization of the account balance as authorized by the Commission,
- c. An entry to reflect any transfer to or from other regulatory accounts as authorized by the Commission, and
- d. An entry equal to the interest on the average balance in the account at the beginning of the month and the balance after the entries above at a rate equal to 1/12 of the interest rate on three-month Commercial Paper for the previous month, as reported in the Federal Reserve Statistical Release, H.15, or its successor publication.

N

5. **Disposition**

The disposition of this account balance will be addressed in SDG&E's next General Rate Case proceeding or other applicable proceeding.

IC0

Advice Ltr. No. XXXX-E

Decision No. AB 375

Issued by

Dan Skopec

Vice President
Regulatory Affairs

Submitted

TBD

Effective

TBD

Resolution No.

TBD



A Sempra Energy utility

Southern California Gas Company
LOS ANGELES, CALIFORNIA

Original
CANCELING

CAL. P.U.C. SHEET NO.
CAL. P.U.C. SHEET NO.

PRELIMINARY STATEMENT - PART VI - MEMORANDUM ACCOUNTS Sheet 1
CALIFORNIA CONSUMER PRIVACY ACT MEMORANDUM ACCOUNT (CCPAMA)

1. Purpose

The CCPAMA is an interest-bearing memorandum account recorded on SoCalGas' financial statements. The purpose of the CCPAMA is to record the incremental costs associated with complying with consumer privacy obligations as required by Assembly Bill (AB) 375, which enacted the California Consumer Privacy Act of 2018, effective June 28, 2018, and modified by Senate Bill (SB) 1121, effective September 23, 2018.

2. Applicability

This account shall apply to all gas customers except those specifically excluded by the Commission.

3. Rates

The CCPAMA shall be applied to rates as described in section 5 below.

4. Accounting Procedures

SoCalGas shall maintain the account by recording entries at the end of each month as follows, net of FF&U, where applicable:

- a. A debit entry to record the incremental operational and maintenance O&M costs and capital-related costs (i.e., depreciation, taxes, and return) in complying with AB375 and SB 1121,
- b. An entry for amortization of the account balance as authorized by the Commission, and
- c. An entry equal to the interest on the average of the balance in the account during the month, calculated in the manner described in Preliminary Statement, Part I, J.

5. Disposition

The balance in the CCPAMA will be addressed in SoCalGas' next General Rate Case or other applicable proceeding.

(To Be Inserted By Utility)
Advice Letter No.
Decision No.
1d0

Issued By
Dan Skopec
Vice President
Regulatory Affairs

(To Be Inserted By Cal. Puc)
Submitted _____
Effective _____
Resolution No. _____